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February 13, 2014

**PRIVILEGED & CONFIDENTIAL  
SETTLEMENT COMMUNICATION**

**VIA FIRST CLASS MAIL AND E-MAIL**

Mr. Richard P. Killian  
Senior Environmental Engineer  
Office of Enforcement Compliance and Environmental Justice  
3 ECOO  
USEPA Region 3  
Philadelphia, PA 19103

**Re: Super Salvage Response to USEPA**

Dear Mr. Killian:

This letter and the attachments hereto are the response of Super Salvage to questions you raised in an email to Mike Logan of Compliance Plus on January 30, 2014. You asked for a response to your request for information by February 13, 2014, and this letter provides the information we have been able to assemble to date. This communication is in the nature of settlement communications and the information herein cannot be used in litigation against Super Salvage.

With respect to an explanation of the hazardous waste determination for the shot-blast booth, please be advised that in the short time since I have been retained to represent the Company, the person who can assist in this response has been unavailable; upon his return that information will be prepared and will be provided to you no later than February 21, 2014.

With respect to sampling sheets and locations for stormwater testing at the facility, Compliance Plus has advised that information on the 1993 sampling event was previously provided to you at the January 30, 2014 meeting. After further inquiry, we have been unable to identify any additional records regarding the 1993 stormwater sampling or the results of that sampling, nor have we identified any records of additional stormwater sampling. We will continue to investigate the issue and will supplement this response if we identify additional information responsive to the request.

With respect to documentation of hydraulic oils purchased for the last five years, please see information in the attachment. The information was assembled by PPC Lubricants, the vendor for Super Salvage's petroleum products.

With respect to the Stormwater Pollution Prevention Plan and SPCC plans, these were provided to the Agency on January 31, 2014.

With respect to a plan to address the evaluation and clean-up of the stormwater run-off pond, Super Salvage is evaluating the regulatory requirements that may be applicable to the Agency's request, and is looking at options for addressing the Agency's concerns, potentially including engineering solutions or best management practices to reduce oil impacts in the pond, and evaluating and addressing the stand pipe. We hope to be able to provide you with an update on the Company's efforts to develop a plan for the pond by February 21, 2014.

Please contact me if you have any questions regarding the enclosed information.

Very truly yours,

SEYFARTH SHAW LLP

  
Jeryl L. Olson

JLO:clb

Attachment

cc: Mr. Daniel Isales, Esq. (w/attachment)  
Mr. Bob Bullock (w/attachment)  
Mr. Michael Logan (w/attachment)

1/31/2014

Confidential and Proprietary, PPC LUBRICANTS  
Bill KipphornCustomer Gallons by Item

From 1/1/2000 to 12/31/2013

For: SUPER SALVAGE INC (PARENT)

Note: gal\_convert column used to calculate total gallons

Description	Cntr Units	Items	Adj Gallons	Total Dollars	Average		Unit
					Item	Gallon	
10/1 CASTROL PYPLX BLUE #2	1.00	3	3	80.85	26.95	26.95000	26.95000
12/1 CASTROL GTX 10W30	3.00	31	93	1,319.55	42.57	14.18871	14.18871
12/1 CASTROL GTX 10W40	3.00	4	12	165.60	41.40	13.80000	13.80000
12/1 CASTROL GTX 5W30	3.00	2	6	82.80	41.40	13.80000	13.80000
12/1 MAG1 5W30	3.00	5	15	149.30	29.86	9.95333	9.95333
12/1 MAG1 ATF D/M	3.00	9	27	219.48	24.39	8.12889	8.12889
120 LB CASTROL PYPLX BLUE #2	120.00	7	105	2,364.00	337.71	22.51429	2.81429
3/1 GAL CASTROL GTX 10W30	3.00	2	6	100.20	50.10	16.70000	16.70000
3/1 GAL CASTROL TEC EX 15W40 CJ4	3.00	484	1,452	20,116.71	41.56	13.85448	13.85448
3/1 GAL SHELL ROTELLA T TP 15W40 CJ4	3.00	25	75	1,144.69	45.79	15.26253	15.26253
35 LB CASTROL AP GEAR 85W140	35.00	6	30	405.30	67.55	13.51000	1.93000
35 LB CASTROL PYPLX BLUE #1	35.00	11	55	1,143.10	103.92	20.78364	2.96909
35 LB CASTROL PYPLX BLUE #2	35.00	5	25	452.56	90.51	18.10240	2.58606
40 LB CASTROL OIL ABSORBENT	1.00	7,125	1,425	9,303.00	1.31	6.52842	1.30568
40/1 CASTROL PYPLX BLUE #1	1.00	15	3	335.45	22.36	111.81667	22.36333
40/1 CASTROL PYPLX BLUE #2	1.00	20	4	430.74	21.54	107.66500	21.53700
40/1 CASTROL PYPLX RED EP #2	1.00	5	1	110.10	22.02	110.10000	22.02000
410 LB CASTROL GEAR EP 150	410.00	39	2,145	27,634.00	708.56	12.88298	1.72821
5 GAL CASTROL TECTION EXTRA 15W40 CJ-4	5.00	26	130	1,589.90	61.15	12.23000	12.23000
55 GAL CASTROL HYD 46 AW	55.00	7	385	2,877.10	382.44	6.95351	6.95351
55 GAL CASTROL PRDN 46 AW	55.00	4	220	2,072.40	518.10	9.42000	9.42000
55 GAL CASTROL TEC EX 15W40 CJ-4	55.00	3	165	1,689.60	583.20	10.24000	10.24000
55 GAL SHELL ROTELLA ELC	55.00	3	165	2,404.48	801.49	14.57248	14.57248
55 GAL SHELL ROTELLA T TP 15W40 CJ-4	55.00	12	660	8,455.49	704.62	12.81135	12.81135
55 GAL SOLVENT 140	55.00	1	55	438.90	438.90	7.98000	7.98000
6/1 GAL CASTROL AF HD W/SCA	6.00	117	702	7,532.46	64.38	10.73000	10.73000
6/1 GAL SHELL ROTELLA E/L AF/C	6.00	33	198	2,875.18	87.13	14.52111	14.52111
6/1 GAL SHELLZONE AF/C	6.00	35	210	1,863.60	47.53	7.92190	7.92190
6/1 QT CASTROL GTX 10W30	1.50	12	18	292.32	24.36	16.24000	16.24000
BALCRANK 1300-001 DRUM PUMP	1.00	1	1	30.00	30.00	30.00000	30.00000
BULK CASTROL HYD 32 AW	1.00	370	370	2,376.40	6.42	6.42000	6.42000
BULK CASTROL HYD 46 AW	1.00	14,993	14,993	101,439.26	6.77	6.76577	6.76577
BULK CASTROL HYD 68 AW	1.00	6,033	6,033	39,409.19	6.53	6.53227	6.53227
BULK CASTROL PRDN 46 AW	1.00	2,969	2,969	20,549.66	6.92	6.92141	6.92141
BULK CASTROL PRDN 68 AW	1.00	6,150	6,150	43,120.25	7.01	7.01142	7.01142
PPC NEW PLASTIC PAIL	1.00	3	3	16.80	5.50	5.50000	5.50000

INTERCHANGEABLE PER PPC SALES REP (TOTAL 30145 gal in 5 yrs)

38,909

304,189.10

7.81796

